In the United States District Court For the District of Nebraska

UNITED STATES OF AMERICA,) CASE NO. 8:21CR301
Plaintiff,) UNOPPOSED MOTION TO
V.) CONTINUE TRIAL
KALEM L. BARBER,)
Defendant.)

The Defendant, Kalem L. Barber, by undersigned counsel, hereby moves this Court for an Order continuing trial herein for 60 days or until the Court's calendar allows. In furtherance of said motion, and as good cause for the granting of the same, Defendant states as follows:

- 1. Trial is scheduled to commence December 13, 2022.
- 2. The parties are attempting in good faith to resolve this matter short of trial.

 Additional time is necessary in order to make further attempts to find a mutually acceptable resolution.
- 3. Defense counsel has spoken to Donald J. Kleine, the Assistant United States Attorney assigned to this case, and he has no objection to Defendant's request for a continuance.
- 4. Counsel has informed the Defendant of his right to a speedy trial in this case.

 Understanding that right, the Defendant agrees that this motion is in his best interests and waives any right to a speedy trial during the pendency of this motion.

WHEREFORE, based upon the above showing, which Defendant asserts is good cause for said continuance, Defendant respectfully requests that this Court hold a hearing in this matter to continue the trial herein for approximately 60 days or until the Court's calendar will allow.

KALEM L. BARBER, Defendant,

By: s/ Karen M. Shanahan

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